

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: April 3, 2003/ 2:30pm

Site Contact(s): David Ward, Eric Espinosa
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Regulatory Contact: James Hindman
Phone: 303-966-4482

Agency: Colorado Department of Public Health and the Environment

Purpose of Contact: To discuss the management and the disposition of the sludge in the B374 tanks to include treatability study, treatment in containers for metals using SP-400 WaterWorks Crystals, and the packaging of wastewater sludge from different tanks in the same waste container. Also, provide the appropriate notification.

Discussion

The State was briefed on the current approach to managing the removal of the sludge from the B374 tanks. The first issue was the need to conduct a treatability study on the sludge from 3 tanks, D804C, D804D and D826B. The test would consist of taking existing 100ml samples adding SP-400 WaterWorks Crystals to the samples and sending them to B559 lab for analysis of TCLP metals. The Site would notify the State of the results and include the appropriate information in the Site's RCRA annual report. James concurred with this approach.

The second issue, assuming the treatability study resulted in an LDR compliant waste, is the mixing of SP-400 WaterWorks Crystals with sludge from tanks D804 C and D, and D826B in the waste boxes to be shipped to EnviroCare. This treatment would be performed under Unit S002 – Oil and/or Aqueous Solidification Process in either room 2804, 3801 or other permitted rooms. It was not clear if the WaterWorks Crystals Aqueous Liquid Solidification Agent named in Unit S002 was the same as the SP-400, either way this contact record would service as the 7-day notice required by S002. The accumulation start date for LDR compliant waste would be the day treated in the waste container. If the approach resulted in and LDR compliant waste, similar sludge from other B374 tanks may be treated in the same manner. James concurred with this approach.

Contact Record 4/10/00
Rev. 9/3/02

The third issue was packaging the wastewater sludge in D-824A with the wastewater sludge from B774, one of the feed systems to D-824A. This would result in approximately 40 drums of TRU Mixed waste with all the EPA codes from both waste being retained in the final waste form to be disposed of at WIPP. The Site considers this the appropriate packaging of these sludges and eliminates any orphan waste from the B374 tanks. James concurred with this approach.

Contact Record Prepared By: David Ward

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